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Attorneys for Third-Party Defendant Ocean Network Express Pte. Ltd.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF THE COMPLAINT OF

Hapag-Lloyd Aktiengesellschaft a/k/a Hapag-  
Lloyd AG

Petitioner,

AS OWNERS AND OPERATORS OF THE  
M/V YANTIAN EXPRESS.

19 Civ. 5731 (GHW) (RWL)

**NOTICE OF MOTION**

Pursuant to the Court's memo-endorsed Order of February 8, 2022 (Dkt. No. 760), Third-Party Defendant, Ocean Network Express Pte. Ltd. ("ONE") by its attorneys, Lyons & Flood, LLP, moves before the Honorable Robert W. Lehrburger, United States Magistrate Judge, for an order dismissing, on the basis of the subject Singapore forum selection clause, the claims identified in Exhibit A to the accompanying declaration of Jon Werner, and for such other and further relief as the Court may deem just and proper.

This motion is further supported by the accompanying declaration of Douglas Wyatt and the Memorandum of Law.

Dated: February 22, 2022

Respectfully submitted,  
LYONS & FLOOD, LLP  
Attorneys for Third-Party Defendant  
Ocean Network Express Pte. Ltd.

s/ Randolph Donatelli  
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